



356902

25 JAN 1988

Duane C. Helmsberger, PE
Deputy Director
Environmental Planning Division
Department of the Air Force
Regional Civil Engineer-Central Region
1114 Commerce Street
Dallas, Texas 75242

Dear Mr. Helmsberger:

The Region V Office of the U.S. Environmental Protection Agency (USEPA) has reviewed the Installation Restoration Program (IRP) Stage 2 Draft Work Plan for the Scott Air Force Base (AFB) located near East St. Louis, Illinois.

As you are aware, sources of waste at Scott AFB include industrial operations, waste storage areas, fuels management, spills and leaks of hydrocarbons, pesticide use, and fire protection training. Eight sites were identified for contamination confirmation studies. They include the base landfill, two fuel facility spill sites, a fuel tank sludge weathering lagoon, three Contamination of concern at these sites are primarily petroleum hydrocarbons, but contaminants at the landfill include paint, pesticides, possible polychlorinated biphenyls (PCB) and assorted drums of unknown contents. The old dental clinic is a possible source for mercury contamination.

Surface drainage from the facility is intercepted by a series of ditches which discharge into Silver and Ash Creeks, and by the creeks themselves. Wastewater is collected at a central facility and discharged, after treatment, under an National Pollutant Discharge Elimination System (NPDES) permit to Silver Creek.

You should include as part of the domestic and water supply well inventory the current depths-to-water records. Water table data from these wells should be consolidated with information from other monitoring wells installed during the ground water studies to provide current subsurface flow patterns, instead of patterns in existence at the time of well installation.

The Work Plan states that, because of the proximity of FPTA #2 to the landfill, the two will be considered as one site for the purpose of well placement. The workplan indicates that four wells will be installed to monitor the ground water below FPTA #2.

However, based upon the information provided only two wells appear to be close enough to give ground water data representative of that site, and neither of these wells is located in the assumed down-gradient direction (southeast). Because these two sites are located over the most prolific ground water supply in the area (Silver Creek Alluvium), an additional well should be installed southeast of FPTA #2 to determine whether or not contaminants are migrating toward South Ditch, which drains to Silver Creek. The main concern is to determine whether FPTA #2 has and is contributing to ground water contamination. The additional well will help remove ambiguity as to the source of any contamination (landfill vs. FPTA #2) which may arise during sampling.

In terms of waste classification, the landfill which has waste disposed in it by the trench and fill method can be classified as a Class 5W20, or industrial process water and waste disposal well, since it is wider (in one dimension) than it is long, and disposes of waste water treatment sludge. Therefore, the characteristics of the wastes as well as the leachate should be determined as required by 40 CFR 141.26.

For the Facility 8550 Spill site, private well number 17 (fig. 3-11) is so close to this site that it should be sampled initially for all petroleum hydrocarbons appearing on the Hazardous Substances List. Any recommendations regarding use of alternative drinking water supplies by nearby residents will be based upon the analytical lab results of these samples. We would be willing to review the data.

For the Facility 1965 Spill Site; if, as the study assumes, ground water flow in the surficial deposits is to the southeast, at least one well should be installed along that orientation from this site to provide an indication of any ground water contamination. Figure 5-5 does not show any monitoring wells along this axis.

Thank you for the opportunity to review this document. If you have any questions concerning our comments, please contact Claude Brogunier of my staff at (312) 353-6704 or myself at 886-7500.

Sincerely yours,

Original signed by:
William D. Franz

William D. Franz, Chief
Environmental Review Branch
Planning and Management Division

cc: Christiana Saada, SWG

BROGUNIER/ERBDisk#1/hk 1-22-88.

Sill, 3/23/88 1:40
Mr. Desai from the
QAO recommended that
the reference to
40 CFR 141.26 be
completely deleted. It has no
relevance in the context used.
CLAUDE X-3-8774